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Attorneys for Plaintiffs

**UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA**

ANIBAL RODRIGUEZ, SAL CATALDO,
 JULIAN SANTIAGO, and SUSAN LYNN
 HARVEY, individually and on behalf of all other
 similarly situated,

Plaintiffs,

v.

GOOGLE LLC,

Defendant.

SUSMAN GODFREY L.L.P.

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Case No.: 3:20-cv-4688-RS

**PLAINTIFFS' DEPOSITION AND
 DISCOVERY DESIGNATIONS AND
 GOOGLE'S OBJECTIONS AND
 COUNTER-DESIGNATIONS**

Judge: Hon. Richard Seeborg
 Trial Date: July 30, 2025
 Time: 9:00 a.m.

Pursuant to the Court's Case Management Scheduling Order entered on January 9, 2025 (Doc. 446) Plaintiffs submit the following deposition and discovery designations, as well as Google's objections and counter-designations thereto.

Attached as Exhibit A is a list of page and line references identifying the deposition designations.

Attached as Exhibit B are excerpts from the deposition of Eric Miraglia referenced in Exhibit A.

Attached as Exhibit C are excerpts from the December 11, 2018 sworn congressional testimony of Sundar Pichai referenced in Exhibit A.

Attached as Exhibit D is a list of page and line references identifying the discovery designations.

Attached as Exhibit E are excerpts from Google's responses to Plaintiffs' interrogatories and requests for admission referenced in Exhibit D.

Dated: August 14, 2025

Respectfully submitted,

By: /s/ Mark Mao

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